



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

ENC. 2

MAY 29 2008

REPLY TO THE ATTENTION OF:

L-8J

Certified Mail: 7001 0320 0006 0202 5028

Return Receipt Requested

Mr. Lenny Vinci
Plant Manager
Wheeling Pittsburgh Steel Corporation
1001 Main Street
Martins Ferry, Ohio 43935

Re: Request for Information
WPSC – Martins Ferry Plant, Martins Ferry, Ohio
EPA ID No: OHD 010 448 231

Dear Mr. Vinci:

This is a request for information pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 United States Code (USC) §6927, regarding the Wheeling Pittsburgh Steel Corporation (WPSC) facility located at 1001 Main Street in Martins Ferry, Ohio (Martins Ferry Facility). The information is requested in follow-up to the inspection conducted at the Martins Ferry Facility on March 31, 2008 and April 1, 2008.

This request requires the Wheeling-Pittsburgh Steel Corporation (the facility or you) to submit certain information relating to management of, and/or potential or actual releases of, hazardous wastes or hazardous waste constituents, at the Martins Ferry Facility located at 1001 Main Street in Martins Ferry, Ohio. We are requiring this information to determine the facility's compliance status with the regulations applicable to large quantity hazardous waste generators under Ohio's authorized hazardous waste program set forth at Ohio Administrative Code 3745-52, and further to determine whether investigation and or cleanup are required under Sections 3008(h), 3013, and/or 7003 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §§6928(h), 6934 and/or 6973, or other applicable statute. The Enclosure specifies the information you must submit. You must submit this information within twenty-eight calendar days of receiving this request to the United States Environmental Protection Agency, Land & Chemicals Division, 77 West Jackson Boulevard, LU-9J, Chicago, Illinois 60604, Attention: Michael Mikulka.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 CFR Part 2, B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Wheeling-Pittsburgh Steel Corporation must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Wheeling-Pittsburgh Steel Corporation to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

Thank you for your cooperation in this matter. If you have any questions, please contact Michael Mikulka of my staff, at (312) 886-6760.

Sincerely,



Margaret M. Guerniero
Director
Land and Chemicals Division

Enclosure

cc: Mr. Bud Smith
Wheeling Pittsburgh Steel Corporation

Mr. Kenneth S. Komoroski
K&L/Gates

Mr. John Rochotte
Ohio EPA SE District Office

Enclosure 1

Request for Information

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Facility
1001 Main Street
Martins Ferry, Ohio**

General Instructions:

This information request applies to all information related to the Wheeling Pittsburgh Steel Martins Ferry facility that is in Wheeling Pittsburgh Steel Corporation's (WPSC) or its representatives' (e.g., attorneys, consultants, agents, employees) possession, custody, or control. Nothing herein is meant to limit the scope of this information request only to information or documents physically present at the WPSC facility located at 1001 Main Street, Martins Ferry, Ohio.

The scope of this request also includes all information and documents independently developed or obtained by research on the part of WPSC, its attorneys, its consultants, its agents, or its employees (e.g., internal facility analyses, memoranda, or reports related to the requested information).

"And as well as or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information that might otherwise be construed to be outside its scope.

WPSC's response must be signed by an authorized and responsible corporate official of WPSC.

"Facility" shall be construed to mean all property, owned or leased, currently or historically associated with or involved in operations at the WPSC facility located at 1001 Main Street in Martins Ferry, Ohio.

General

1. Provide simplified process flow diagrams for the overall facility production and for each current major process area. To the extent that the galvanizing lines currently in production are materially different, provide a process flow diagram for each line. If other production processes existed at the Martins Ferry plant in the past which have since been discontinued, provide process diagrams for those production processes, as well as a map showing where in the facility those processes operated. Include descriptions/process flow diagrams for former processes which operated at

Plant 1.

2. Provide a copy of the annual hazardous waste report for 2007 for the facility.
3. Provide a list of all solid wastes currently generated at the Martins Ferry facility. Include an identification where such wastes are generated, and what process they are associated with. Provide a copy of all determinations made by WPSC supporting a conclusion that a particular solid waste generated at the facility is or is not a hazardous waste. Solid wastes associated with this request include, but are not limited to: zinc bag house dust; solids from alkali dip tank; vacuum filter solids from the wastewater treatment plant; Chem-treat wastes at each of the 3 galvanizing lines; solids generated from the roll grinder shop; etc.
4. Provide a map showing the locations of existing hazardous waste accumulation areas, including satellite accumulation. Also, identify on the map the locations where solid wastes are generated as identified in item 3 above.
5. Provide a simplified diagram of the current wastewater treatment operations at the plant. Identify when the plant was placed into operation, the dates of any major modifications, and the capacities of the various units.
6. Provide a description and map of current storm water drains, infrastructure, and discharge points located at the Martins Ferry facility.
7. Identify if there are any abandoned storm sewers at the Martins ferry facility, and if so, identify their location on a map. State when such storm sewers were abandoned.
8. Identify flood prone areas on a facility map and indicate any portions of the facility that may be located within the 100-year flood plain, as defined by the Federal Emergency Management Agency.

Waste Management Areas/Units

9. For each area and/or unit identified in the preliminary list of solid or hazardous waste management areas in Attachment 1, or for any other waste management unit historically or currently located at the Martins Ferry facility, briefly describe the: (i) location and function; (ii) size, volume, and capacity; (iii) physical integrity; (iv) containment or other pollution control features; (v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure; (vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit; (vii) associated spill or release history and spill or release control; (viii) information on the nature and extent of contamination (including sampling data) in the vicinity of the area or unit, and (ix) remedial actions performed to clean up these

areas.

10. Provide a list of all spills or releases of chemicals, hazardous materials, and/or wastes (including items identified during facility- or government-led inspections) that have occurred at or adjacent to the Martins Ferry facility throughout its operating life. For each spill or release, include information on the location and date of the spill or release, types and amounts of material spilled or released, the facility's response to the spill or release (including the preparation of any internal facility analysis, memorandum, or report relating to the spill or release; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results), and any regulatory agency response to the spill or release. Whenever possible, the source of the spill should also be identified. Provide a list and description of all historical, current, or planned remedial actions to address spills or releases associated with the Martins Ferry facility. Include a map, list, and description of all impact areas in soil, groundwater, surface water, and sediment. Include a map, list, and description of all soil/sediment excavations and treatment operations, groundwater remediation, or other corrective measures that have occurred at the facility. Identify the location of each of these areas on a map, along with specific sampling locations and monitoring wells. Closure documentation and confirmatory sampling results (including soil, groundwater, surface water, sediment, and wipe samples, as appropriate) should be provided for noted investigation and closure activities at the solid or hazardous waste management areas that have been identified thus far.
11. Please clarify the location and historical/current usage and status of the "TFS sump."
12. During the inspection of the current less-than-90 day storage area for Chem-treat waste on March 31, 2008, a pallet was observed in the same general area that contained 14 GE capacitors marked "contains liquid dielectric III" and "no PCBs". Have the contents of these capacitors been tested for PCBs? If so, provide a copy of the results. In what location were these capacitors originally used, and when were they removed?
13. Regarding the "oil storage building" which was empty during the inspection, a WPSC representative stated that "empties" are now stored outside the building in a partially curbed area, but that previously, full containers were stored there. Were the full containers which were stored in this area product, or solid or hazardous waste? Were there any releases in this area, and if so, what was released and when, and what cleanup efforts were taken? Provide copies of any sampling results and reports associated with cleanup.
14. Regarding the former acid/alkali storage area near the river, where acid and alkali

wastes were reportedly dumped into rolloff boxes, and there was no secondary containment. Were these acid or alkali wastes hazardous wastes? Provide supporting documentation. Were there spills or releases of acid or alkali wastes in this area? If so, when and in what amounts? If there were spills or releases, was any sampling or clean-up of spilled or released material done? If so, provide copies of any sampling results and reports associated with clean-up.

15. Regarding the new acid/alkali storage area adjacent to the wastewater treatment plant, four (4) E-tanks were observed on April 1, 2008. A green liquid was observed in front of the E-tank closest to the road. See camera 1, photo P4010006. What was the green liquid, and had it been released from the E-tanks? Was any clean-up done? Provide copies of any supporting documents, including sampling results and any reports associated with clean-up.
16. Regarding the former storage area located on a fill area behind the new acid/alkali storage area, provide a description of what types of materials and/or wastes have been stored here. On April 1, 2008, a pile of material which was described as being from a coal hopper and a brown unknown material were observed in this location. What were the source(s) of those materials? Provide any supporting information including waste determinations and disposal manifests.
17. Regarding the former waste oil tank that was located adjacent to the HCl storage tank, provide details regarding its construction and history of spills or leaks, and when it was removed/closed.
18. Regarding the waste acid/alkali tank under the 60" galvanizing line, provide a history of leaks or spills from this tank and appurtenances. Has an assessment been done of the structural integrity of the tank and its support structure? If so, provide a copy.
19. Regarding the waste sump under the 60" line in the basement, has there been an assessment of the structural integrity of this sump, and has there been a history of leaks from this sump? If so, provide copies.
20. Regarding the 36" galvanizing line, during the inspection on April 1, 2008, there was sludge/residue associated with the line at the point where the Chem-treat is applied. Now that WPSC has decided to permanently close that line, has the material that was present during the inspection been cleaned up yet? Provide copies of any supporting documents/manifests.
21. Regarding the Roll Grinder shop, what is the typical schedule for grinding rolls from the Chem-treat area? What is the typical generation of waste solids from this area in kg/mo? Provide any supporting documents for waste determinations from

this area.

22. During the inspection on April 1, 2008, Transformer TF-3A, Serial Number 6530907, with an oil volume of 1,790 gallons, was observed to be leaking to the concrete pad. The leak was in close proximity to a surface drain that reportedly drains to the wastewater treatment plant. What type of oil is used in this transformer? Have PCBs been used in this transformer? Has the leak been repaired? Provide supporting documentation.

Storm Water/Wastewater Systems

23. For each area and/or unit identified in Attachment 1, or for any other storm water and National Pollutant Discharge Elimination System (NPDES)-permitted or non-NPDES permitted wastewater treatment systems historically or currently operated at the facility, describe the: (i) location and function; (ii) size, volume, and capacity; (iii) physical integrity; (iv) containment or other pollution control features; (v) date of construction, operation, cessation of operation, abandonment, and approved closure; (vi) types and amounts of materials stored, treated, managed, or disposed in the area and/or unit; (vii) associated spill or release history and spill or release control; (viii) information on the nature and extent of contamination (including sampling data) in the vicinity of the area or unit, and (ix) remedial actions performed to clean up these areas.
24. Provide updated detail on current status and investigation of the old buried clay pipeline from the acid and alkali tank to the WWTP's concrete holding pit (as discussed in Reference 44).
25. Provide an update as to the status of sediment removal from the Martins Ferry facility sewer system (as proposed in Reference 46), disposition of removed sediments, and any effect the removal action has had on exceedances of NPDES permit limits at Outfalls 001 and 002.
26. The wastewater treatment plant was inspected on April 1, 2008. During the inspection, it was observed that the oil skimmer was not operating. Is this the usual operating practice? How would oil be removed in the event of a spill if the oil skimmer was not operating? Provide any explanation why the oil skimmer was not operating.

Soil

27. According to the WPSC letter cited as Reference 3 in Attachment 2, a background soil sample was collected from area 12 as part of corrective action implemented in early 1989. It is unclear whether this sample was a background sample (as

reference in the cited letter) which would have been collected from some other presumably un-impacted portion of the facility for comparison. The letter of the text appears to indicate that this sample was actually a confirmation soil sample collected beneath the excavation area. Provide additional detail as to the location from which this sample was collected, and any other means used to verify that contamination associated with the sludge release was satisfactorily remediated both laterally and vertically.

28. During the inspection, the Plant 1 electrical substation was inspected. Three large transformers (TF7A, TF7B and TF7C) and three smaller transformers (TF14A, TF14B and TF14C) were observed in this area. One of the large transformers is out of service but has not been removed. Stained soil was observed in the transformer area associated with each of the large transformers, as well as staining of both the soil and concrete pad associated with the 3 smaller transformers. In addition, soil staining appears evident on the soil outside but adjacent to the transformer area. See photos from Camera 1, P4010010 and P4010011. Do any of these transformers contain or have they ever contained PCBs? If so, what PCB product was used in the transformers, and when was it used? Regarding the stained soil, has any sampling been done of the soil in this area? If so, provide a copy of the results. What is the cause of the soil staining in the area outside the fence, adjacent to the transformers? Has any sampling been done of the soil in this area? If so, provide a copy of the results.

Air

29. Given the reported exceedances in emissions from the galvanizing baghouse, provide details on the potential for deposition of dust on the WPSC property and surrounding areas, as well as risks identified with respect to such deposition.
30. During the inspection on March 31, 2008, when inspecting the galvanizing baghouse area, the group was splashed with drippage from the baghouse stack, which was a yellow color. Numerous drips of this material were noted on the concrete adjacent to the stack (see photo from Camera 1, P3310001). Regarding this material, has any testing been done to identify it? If so, provide a copy. Has any effort been made to identify the extent of the area which has been impacted by the drippage? Provide any supporting documents.

Groundwater

31. Regarding the 4,000 gallon gasoline underground storage tank (UST), provide details regarding its construction, dates placed in service, and all information regarding any past leaks or spills, including all information regarding any soil cleanup and/or groundwater monitoring associated with this UST.
32. Regarding the old gasoline UST located in the same general vicinity, provide details regarding its construction, dates placed in service, and all information regarding any past leaks or spills, including all information regarding any soil cleanup and/or groundwater monitoring associated with this UST. Provide copies of all reports provided to regulatory agencies (e.g., BUSTR) regarding this UST. Particular detail should be provided to support the assertion in Reference 26 (Attachment 2) that petroleum-based contamination in groundwater is naturally attenuating. The current status of groundwater remediation should be discussed, including the frequency and extent of the bailing and monitoring program, and plans to install soil vapor extraction and/or air sparging operations (as mentioned in Reference 21 in Attachment 2).
33. Provide a list, description, and map identifying the location of all groundwater supply and groundwater monitoring wells located at the Martins Ferry facility and on adjacent properties, and all well surveys that have been completed. Provide a list of all abandoned wells located on site and the reason for abandonment.
34. Provide the most recent three (3) years of groundwater monitoring data for all monitoring wells at or adjacent to the Martins Ferry facility. Identify the location of monitoring wells that are currently being sampled on a map. City of Martins Ferry Municipal Water Authority wells should also be noted on the map. Additionally, provide a summary of historic monitoring results for all wells that are currently in use or that have been abandoned.
35. Provide a geologic cross-section diagram for the Martins Ferry facility.
36. Provide the most recent water level data and/or groundwater contour maps for the Martins Ferry facility, along with information on any seasonal or historical variations in the groundwater elevations.
37. Provide information on any Martins Ferry facility procedures used to identify and close unused or abandoned wells and the history of any wells that are currently operating or have been closed on site.
38. Provide any available data collected from the City of Martins Ferry Municipal Water Authority wells to document the lack of site-related impacts.

Attachment 1

Preliminary List of Solid or Hazardous Waste Management Areas)

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Facility
1001 Main Street
Martins Ferry, Ohio**

Unit	Description
1	Roll-off Containing Bag House Residue
2	Drainage System Beneath Facility
3	Historic Carbon Filter for Electric Room
4	Pits Beneath 48" Process Line
5	Small Roll-offs that Contain Metal Bands from New Coils Located in Building 203
6	Alkali Catch Basin and Trench
7	Vent Exhaust Fan Located in Building 203
8	Zinc Chloride Tank 21
9	Galvanizing Line Baghouse
10	Waste Tote – Chem Treat along the 48" Galvanizing Line
11	Waste Paint and Thinner, Waste Ink and Sorbent Pads Satellite Accumulation Area
12	Historic "Chem Treat" Storage Area
13	Plant 1
14	Current Hazardous Waste 90-Day Storage Area Located in Building 115
15	Roll-off Containing Cardboard, Plastic, and Metal Bands Located South of Building 115
16	Former ARCO Scrubber Unit
17	Asbestos Storage Roll-off
18	Former Acid and Alkali Waste Storage Area
19	Used Oil Storage Area
20	Solid Waste Roll-off
21	Acid and Alkali Residual Waste
22	Waste Water Treatment Plant
23	Acid Storage Area
24	Historic Used Oil Location
25	Solid Waste Roll-off Located South of Building 254
26	Waste Acid and Alkali Tank Located in the Basement of Building 254
27	Basement Sump Located in the Basement of Building 254
28	Waste Acid and Alkali Holding Tank

29	Quenching Water Tank Process Water Catch Basin
30	Chem Treat (D007) Satellite Accumulation Area Located Along the 60" Galvanizing Line
31	Waste Ink and Sorbent Pads Satellite Accumulation Area Located Along the 60" Galvanizing Line
32	36" Line Chromic Acid Sludge
33	Parts Washer in Forklift Repair Shop
34	Roll Grinding Waste
36	Transformers (9)
37	4,000-gallon UST, Gasoline
38	6,000-gallon AST, Diesel
39	LUST Area
40	Drum Storage Area (leaking)
41	North Transformer (leaking)

Attachment 2

Preliminary Reference List

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Plant
1001 Main Street
Martins Ferry, Ohio**

1. Hazardous Waste Management Manual. Prepared by Chester Engineers. Dated March 15, 1982.
2. Letter from Michael Moschell, OEPA, to W. R. Samples, WPSC, re: Violations at WWTP Storage Area. Dated February 23, 1983.
3. Letter from Michael Moschell, OEPA, to Nancy Ray, WPSC, re: Sludge Disposal Area Cleanup Sampling. Dated December 9, 1988.
4. Martins Ferry Plant Spill Prevention, Control, and Countermeasures Plan. Prepared by WPSC. Dated March 1989.
5. Letter from Nancy Ray, WPSC, to Michael Moschell, OEPA, re: Soil Sampling Results from Sludge Disposal Area Cleanup. Dated March 13, 1989.
6. Letter from Martin Stephenson, WPSC, to Chief Deputy Shamblin, Ohio County of West Virginia Sheriff's Department, re: Hazardous Waste Disposal Incident. Dated December 13, 1990.
7. Letter from Martin Stephenson, WPSC, to Michael Moschell, OEPA, re: Disposal of D007 Hazardous Waste Solid. Dated January 22, 1991.
8. Letter from Cindy Pelley, OEPA, to Martin Stephenson, WPSC, re: January 31, 1991 Compliance Evaluation Inspection (CEI). Dated March 7, 1991.
9. Letter from Martin Stephenson, WPSC, to Cindy Pelley, OEPA, re: RCRA CEI Report (January 31, 1991 Inspection). Dated April 10, 1991.
10. Letter from Martin Stephenson, WPSC, to Cindy Pelley, OEPA, re: Hazardous Waste Issues. Dated May 20, 1991.
11. Martins Ferry Plant Spill Prevention, Control, and Countermeasures Plan. Prepared by WPSC. Revised March 1992.
12. Martins Ferry Plant NPDES Permit Application (Stormwater). Prepared by WPSC. Dated September 28, 1992.

13. Letter from Abbot Stevenson, OEPA, to William Samples, WPSC, re: June 23-24, 1994 CSI. Dated September 14, 1994.
14. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 7-8, 1994 CEI. Dated October 14, 1994.
15. Letter from Lori Ann Clark, WPSC, to Richard Stewart, OEPA, re: Response to October 14, 1994 OEPA Letter. Dated November 16, 1994.
16. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 7-8, 1994 CEI. Dated January 11, 1995.
17. Drum Storage Area Generator Closure Plan. Prepared by Groundwater Technology, Inc. Dated July 24, 1995.
18. Letter from Thomas Webster, WPSC, to Richard Stewart, OEPA, re: September 27, 1995 Hazardous Waste Follow Up Inspection. Dated September 29, 1995.
19. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 27, 1995 Follow Up CEI. Dated October 11, 1995.
20. Letter from Abbot Stevenson, OEPA, to William Samples, WPSC, re: May 7, 1996 CSI. Dated June 27, 1996.
21. Letter from William Samples, WPSC, to Abbot Stevenson, OEPA, re: Response to June 27, 1996 OEPA Letter. Dated July 22, 1996.
22. Letter from Mary Washko, Fluor Daniel GTI, to Tom Webster, WPSC, re: Closure of Drum Storage Area. Dated August 12, 1996.
23. Martins Ferry Plant Stormwater Pollution Prevention Plan. Prepared by Chester Engineers. Dated September 1996.
24. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: October 22, 1997 Container Storage Area. Dated November 17, 1997.
25. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: October 22, 1997 Inspection Response. Dated December 5, 1997.
26. Letter from Lisa Romito, WPSC, to Abbot Stevenson, OEPA, re: Response to September 4, 1998 CSI Letter. Dated September 25, 1998.
27. Martins Ferry Plant Hazardous Waste Generator Contingency Plan. Prepared by WPSC. Dated May 1999.

28. RCRA Hazardous Waste Generator CEI Checklist. Prepared by OEPA. Dated June 8-11, 1999.
29. Letter from Bud Smith, WPSC, to John Shepler, USEPA, re: Multi-media Information Request Documents (3rd Submittal). Dated July 30, 1999.
30. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: June 8-11, 1999 Multi-media Compliance Inspection. Dated August 26, 1999.
31. Letter from Lisa Romito, WPSC, to Richard Stewart, OEPA, re: Response to August 26, 1999 Letter. Dated December 7, 1999.
32. OEPA Email Correspondence between Richard Stewart and Jeff Mayhugh, re: WWTP Pit. Dated December 7, 1999.
33. Letter from William Polomik, Jr., WPSC, to Abbot Stevenson, OEPA, re: Response to March 6, 2000 Correspondence. Dated April 4, 2000.
34. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: June 8-11, 1999 Multi-media Compliance Inspection. Dated June 30, 2000.
35. Letter from Todd Koget, WPSC, to Abbot Stevenson, OEPA, re: Wastewater Treatment Plant Exceedances. Dated March 21, 2001.
36. Agenda from Settlement Meeting of Water Issues. Prepared by OEPA. Dated April 3, 2001.
37. Baghouse Dust Illegal Disposal Incident Report. Prepared by National Response Center. Dated April 12, 2001.
38. Letter from Patrick Smit, WPSC, to Richard Stewart, OEPA, re: Response to March 19, 2001 OEPA Letter. Dated April 20, 2001.
39. Letter from John Rochotte, OEPA, to Patrick Smith, WPSC, re: Baghouse Dust Dumping Complaint. Dated May 8, 2001.
40. Letter from Abbot Stevenson, OEPA, to Bud Smith, WPSC, re: July 11, 2001 CEI. Dated August 8, 2001.
41. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated December 12, 2001.
42. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to December 12, 2001 RCRA Inspection Letter. Dated April 19, 2002.

43. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated September 16, 2002.
44. Letter from Abbot Stevenson, OEPA, to Bud Smith, WPSC, re: April 8, 2003 CEI. Dated April 18, 2003.
45. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to May 27, 2003 RCRA Inspection Letter. Dated June 27, 2003.
46. Letter from Bud Smith, WPSC, to Abbot Stevenson, OEPA, re: Sewer Manhole Sediment Sampling Results. Dated December 28, 2003.
47. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to November 6, 2003 RCRA Inspection Letter. Dated March 12, 2004.
48. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated April 6, 2004.
49. Letter from John Rochotte, OEPA, to Pat Smith, WPSC, re: October 25, 2004 Compliance Inspection. Dated November 24, 2004.
50. Sampling Report Prepared by John Rochotte, OEPA. Dated January 3, 2007.